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# MEMO ENDORSED

April 7, 2025

## VIA ECF

The Honorable Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007

The Honorable Gary Stein  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007

Re: Grecia v. Brass Lion, et al., 25 CV 1484 (JHR) (GS)

Dear Judge Rearden and Judge Stein:

We write on behalf of defendants Brass Lion Entertainment, Inc., Justin Smith, and Bryna Smith (together, the “Smiths”) in the above-captioned case to respectfully request (1) leave to redact a document filed by *pro se* Plaintiff William Grecia (“Plaintiff”) containing Bryna Smith’s email address, and (2) that Plaintiff be directed to redact the Smiths’ personal information from future filings.

On April 2, 2025, the Court issued an order granting the Smiths’ motion to redact and seal certain documents filed by Plaintiff (the “April 2 Order”). (Dkt. No. 34.) The Court specifically found that “Defendants’ interest in maintaining the confidentiality of the redacted portions of the filings, specifically Defendants’ home address, email addresses, and phone numbers, as well as photos of their home, outweighs the presumption of full public access to the judicial documents in which that information is contained.” (*Id.* at 4.)

On April 4, 2025, Plaintiff filed a purported “Emergency Motion to Compel Adherence to Contractual Jurisdiction and Correction of Unlawful State Court Actions” (the “April 4 Motion”), which attached several exhibits, including a copy of an agreement that contains Mrs. Smith’s email address. (Dkt. No. 36 at 9.)



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Hon. Jennifer H. Rearden

Consistent with the April 2 Order, we respectfully request that the Court issue an order:

- 1) Granting our request to redact Bryna Smith's email address from Plaintiff's April 4 Motion;
- 2) Directing the Clerk of the Court to seal the unredacted version of the April 4 Motion, and to file publicly the redacted version submitted with this letter;
- 3) Directing that, absent further order of the Court, the Clerk shall deny access to this sealed filing to anyone except for a party, a counsel of record to any party, or a representative of a counsel of record to any party; and
- 4) Directing Plaintiff to redact Defendants' personal information, including email addresses, home address, and phone numbers, from any future filings.

Pursuant to Rule 9.C.iii of Your Honor's Individual Rules, we have publicly filed via ECF this letter-motion and a copy of the April 4 Motion with proposed redactions, and we have filed under seal an unredacted copy of the April 4 Motion with the proposed redactions highlighted.

Respectfully submitted,

/s/ Allon Lifshitz

Allon Lifshitz

Jillian Gray

**COHEN & GRESSER LLP**

800 Third Avenue, 21st Floor

New York, New York 10022

cc: All Parties (via ECF)<sup>1</sup>

SO ORDERED.

Dated: April \_\_, 2025

\_\_\_\_\_  
Honorable

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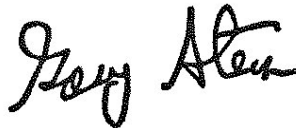
<sup>1</sup> On April 7, 2025, Plaintiff filed a completed Consent & Registration Form to Receive Documents Electronically. (Dkt. No. 44.) Therefore, and pursuant to Judge Rearden's Individual Rules and Practices in Civil *Pro Se* Cases ("*Pro Se* Rules"), we have served Plaintiff only via ECF. (See *Pro Se* Rule 7 ("If a *pro se* party consents to electronic service . . . that party will not receive hard copies of any document filed on ECF or served by email").)

On April 1, 2025, the Court granted Defendants' motion to seal several unredacted documents that contained Defendants' home addresses, email addresses, and phone numbers. (Dkt. No. 34). Defendants again seek to seal documents filed by Plaintiff that contain Defendants' email and other identifying information. The request to keep under seal the unredacted version of Dkt. No. 36 is granted. Plaintiff is directed to redact Defendants' home addresses, email addresses, and phone numbers in any future filings. The parties are further directed to comply with the Judge Rearden's individual practice rules regarding redactions and sealing, available at <https://nysd.uscourts.gov/hon-jennifer-h-rearden>, and Federal Rule of Civil Procedure 5.2.

Pursuant to Federal Rule of Civil Procedure 5.2, unless the court orders otherwise and barring any exceptions provided within the Rule, a filing that contains "an individual's social-security number, taxpayer-identification number, or birth date, the name of an individual known to be a minor, or a financial-account number" must be redacted to include only the last four digits of a social-security or taxpayer-identification number, the year of the individual's birth, the minor's initials, and the last four digits of the financial-account number. The Court notes that several documents within Dkt. No. 36 contain Plaintiff's personal identifiable information and should be redacted as described above. If Plaintiff wishes to redact his own personal identifiable information in Dkt. No. 36 in compliance with Rule 5.2, Plaintiff may file a version with further redactions. However, Plaintiff must still retain Defendants' redactions approved in this Order (redacted version available at Dkt. No. 46, Ex. 1). Plaintiff is reminded that he may reach out to the Court's *Pro Se* Office for assistance if needed.

SO ORDERED.

Dated: New York, New York  
April 11, 2025

A handwritten signature in black ink, appearing to read "Gary Stein", written in a cursive style.

**Gary Stein**  
**United States Magistrate Judge**  
**Southern District of New York**